

**MATTHEW Q. CALLISTER, ESQ.**

Nevada Bar No. 1396

mqc@call-law.com

**MITCHELL S. BISSON, ESQ.**

Nevada Bar No. 11920

mbisson@call-law.com

**CALLISTER & ASSOCIATES**

823 Las Vegas Blvd. South, Ste. 330

Las Vegas, NV 89101

Tel. (702) 385-3343

Fax. (702) 385-2899

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

IMA ILIU FLORES ZELAYA, individually and  
as legal guardian of LUIS JERSAIN SOLANO,  
JR., a minor; ELIA DEL CARMEN SOLANO-  
PATRCIO, individually, and as Special  
Administrator of the Estate of Luis Solano;

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; et al.

Defendants.

Case No.: 2:13-cv-01181-JAD-CWH

**STIPULATION AND  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO FILE REPLY IN  
SUPPORT OF MOTION FOR PARTIAL  
SUMMARY JUDGMENT  
(Second Request)**

Pursuant to Local Rules 6-1, 6-2, and 7-1, Plaintiff Elia Del Carmen Solano-Patricio, individually and as Special Administrator of the Estate of Luis Solano and Defendants David Aspiazu, Bradley Temple, Patrick Gray, and Eugene Dixon (hereinafter "Defendants"), by and through their respective counsel of record, hereby stipulate and respectfully request that the Court extend the deadline by which Plaintiff is to file the Reply in Support of Motion for Partial Summary Judgment from October 9, 2015 to **October 13, 2015**. Plaintiff filed the Motion for Partial Summary Judgment on August 18, 2015 [Dkt. 83] and Defendants filed the Response to Plaintiff's Motion on September 17, 2015 [Dkt. 91]. The parties' first request for an extension was granted on September 25, 2015 [Dkt. 96].

1  
2 The requested extension is not being sought to unduly delay the proceedings; rather,  
3 good cause exists for this extension as Plaintiff's counsel has been in a trial preservation  
4 deposition in an asbestos defense case for three consecutive days now, and the deposition is  
5 unexpectedly going forward tomorrow as well. Therefore, Counsel will be in deposition and will  
6 not be able to finalize the reply by October 9, 2015. Plaintiff's counsel had been waiting to  
7 finalize the Reply until after the depositions of the Coroner Investigator and Medical Examiner,  
8 which were just conducted on October 5, 2015.  
9

10 Based on the foregoing, good cause exists to grant the requested extension.  
11

12 Dated this 8 day of October, 2015.

Dated this 8 day of October, 2015.

13  
14 /s/ MITCHELL S. BISSON, ESQ.  
MATTHEW Q. CALLISTER, ESQ.  
Nevada Bar No. 1396  
15 MITCHELL S. BISSON, ESQ.  
Nevada Bar No. 11920  
16 CALLISTER & ASSOCIATES  
823 Las Vegas Blvd. South, Suite 330  
17 Las Vegas, NV 89101  
mqc@call-law.com  
18 *Attorneys for Plaintiffs*

/s/ CRAIG R. ANDERSON, ESQ.  
CRAIG R. ANDERSON, ESQ.  
Nevada Bar No. 6882  
MARQUIS AURBACH COFFING  
1001 Park Run Drive  
Las Vegas, NV 89145  
canderson@maclaw.com  
*Attorneys for LVMPD Defendants*

19  
20 IT IS SO ORDERED:  
21

22   
23 UNITED STATES DISTRICT JUDGE  
24

25 DATED October 9, 2015.  
26  
27  
28